

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

Chapter 11

HealthStar Staffing, Inc.

Case No. 03-30887

Debtor.

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**RESPONSE OF ROSEDALE PROPERTIES TO DEBTOR'S OBJECTION TO  
ADMINISTRATIVE CLAIM NO. 59**

1. The undersigned, as attorney for Rosedale Properties LLC ("Claimant")<sup>1</sup> provides this response to Debtor's objection to the administrative portion of Claimants filed proof of claim no. 59.

2. Attached hereto and marked as **Exhibit A** is a true and correct copy of the Move In/Move Out Notice which verifies that Debtor did not vacate the premises until March 31, 2003.

3. Debtor and Claimant had agreed to receive \$1,500.00 in rental payment for Debtor to remain on the premises for the month of March.

4. However, Debtor was obligated to make payment for the month of February at the fair market value.

5. Debtor did not make any payments in February. Debtor's filed for bankruptcy on February 7, 2003. The February rent was \$3,000. Therefore, Claimant will stipulate to an allowed administrative claim in the prorated amount of \$2,357.10 (22/28 days for the month of February 2003).

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<sup>1</sup> Reit Management & Research, Inc. actually managed the property for the Claimant.

RIDER BENNETT, LLP

By /s/ Daniel J. McGarry  
Daniel J. McGarry (273855)  
Attorneys for Claimant  
333 South Seventh Street, Suite 2000  
Minneapolis, Minnesota 55402  
(612) 340-7916

Dated: August 23, 2004

**VERIFICATION**

I, Susan Clouser, CPM, Area Manager for Reit Management & Research LLC, declare under penalty of perjury that the facts set forth in the foregoing Response are true and correct according to the best of my knowledge, information and belief.

Dated: August 20, 2004

  
Susan Clouser

REIT MANAGEMENT & RESEARCH  
MOVE IN/MOVE OUT NOTICE

PROPERTY: Rosedale Corporate Plaza

603352

DATE: 4/10/03

TENANT: HealthStar Staffing, Inc.

UNIT/SUITE #: 130

RENTABLE SQUARE FOOTAGE: 3,364 (currently occupying only 1,500 sf)

**MOVE IN:**

DELIVERY DATE: \_\_\_\_\_ SUBSTANTIAL COMPLETION DATE: \_\_\_\_\_

MOVE IN DATE: \_\_\_\_\_ LEASE COMMENCEMENT DATE: \_\_\_\_\_

INDUSTRY DESCRIPTION: \_\_\_\_\_

SIC CODE: \_\_\_\_\_

**MOVE OUT:**

MOVE OUT DATE: 3/31/03

LEGAL POSSESSION DATE:  
(If different than expiration date due to eviction, etc.)

3/31/03

LEASE EXPIRATION DATE:

M-T-M set date of 3/31/03

Security Deposit on hand: \$2,500.00

Application to open A/R balance: \$17,500.00

Other deductions: 777

Specify: May have some move out repairs

Security Deposit Refund: None

Final Inspection Date: 3/31/03

Tenant's Forwarding Address:

Healthstar Staffing Phone: 651-633-7302

1327 County Road D East Contact: Tim Lively

St. Paul, MN 55109

ADDITIONAL COMMENTS: Tenant is in bankruptcy proceedings. Tenant could not afford rent at Rosedale Corporate.

PM working with local attorney on collection efforts.

  
Property Manager Signature

Please fax the completed form to each of the following persons:  
Camille Baillet (617) 828-1305  
Yvonne Saunders (617) 796-8243

EXHIBIT

A

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

**HEALTHSTAR STAFFING, INC.,**

Case No. 03-30887

Debtor.

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**UNSWORN CERTIFICATE OF SERVICE**

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I, Tammy L. Dochniak, declare under penalty of perjury that on August 23, 2004 I faxed copies of the foregoing **Response of Rosedale Properties to Debtor's Objection to Administrative Claim No. 59** by facsimile to each entity named below at the address stated below for each entity:

Robert B. Raschke  
U.S. Trustee  
US Trustee Office  
300 South 4th Street, Room 1015  
Minneapolis, MN 55415  
612-664-5516

John A. Hedback, Esq.  
Hedback, Arendt & Carlson PLLC  
Suite 201 Anthony Place  
2855 Anthony Lane South  
St. Anthony, MN 55418  
612-789-2109

Office of the United States Trustee  
1015 US Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
612-664-5516

RIDER BENNETT, LLP

By                     /e/ Tammy L. Dochniak                      
Tammy L. Dochniak  
Legal Administrative Assistant  
333 South Seventh Street  
Suite 2000  
Minneapolis, MN 55402  
(612) 335-3833

Dated: August 23, 2004